

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

LORETTA POLISENO-FISCHER

Chapter 13

Case No. 18-43429

Debtor(s).

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RESPONSE TO CREDITOR MOTION TO DISMISS CASE

Debtor, by and through her undersigned counsel, hereby responds to the motion filed by Creditor, AJX Mortgage Trust I to dismiss. In support thereof, Debtor provides the following:

1. On August 15, 2018, the Court ordered Creditor and Debtor to participate in the Loss Mitigation Program thereby ordering both parties to participate with good faith in pursuing a loan modification.
2. On September 19, 2018, Creditor filed a motion to dismiss.
3. Debtor has provided all documents that have been requested by the Creditor and by the Trustee as she continues to participate in the LMM program. Debtor has acted in good faith and is entitled to continue in the LMM program.

Wherefore, Debtor respectfully requests this Court deny Creditor's Motion to Dismiss.

Date: November 26, 2018

/s/ Naomi Zeltser
26 Court Street
Suite 1200
Brooklyn, NY 11242
718-831-2529